

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED

OCT 9 4 36 PM '97

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS PLUNKETT TO INTERROGATORY OF  
THE OFFICE OF THE CONSUMER ADVOCATE  
(OCA/USPS-T40-34)

The United States Postal Service hereby provides the response of witness Plunkett to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T40-34, filed on September 25, 1997. Responses to interrogatories OCA/USPS-T40-32-33, 35 (in part), and 37-39 were filed on October 6, 1997. Objections to interrogatories OCA/USPS-T40-35 (in part) and 36 were filed on October 6, 1997.

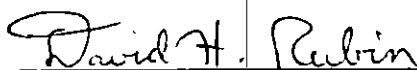
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
David H. Rubin

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2986; Fax -5402  
October 9, 1997

RESPONSE OF U.S. POSTAL SERVICE WITNESS PLUNKETT TO  
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T40-34. Please refer to your response to OCA/USPS-T40-12. You state that in FY 1997, a total of 408 appeals were filed. Please provide a breakdown of these appeals by type of appeal (e.g., claimant did not think the actual value placed on the item was sufficient, etc.).

OCA/USPS-T40-34 Response:

A breakdown of the 251 claims that have been resolved is attached. A breakdown of pending cases is not available at this time.

### CLAIMS APPEALS

TYPE	NUMBER	
Original container not presented to postal authorities for inspection	22	
Claim paid to mailer not addressee, payee dispute	3	
No indemnity for damage resulting from shock or transportation	12	
No evidence of value	3	
No visible sign of damage to exterior package or container	74	
Delayed Express Mail	3	
Delayed Express Mail - Birds	4	
Express Mail claim not filed within 90 days	1	
Express Mail replacement/reconstruction costs	4	
Delayed Registered Mail	2	
Failure to provide actual value at time of mailing	2	
Actual value versus replacement value (depreciation)	1	
Nonpayment of additional costs for sentimental value	1	
No evidence of insurance	4	
Loss of original mailing receipt	7	
COD - no value of contents	1	
Nonpayment for consequential losses	10	
Replacement airline tickets not purchased	2	
Claiming more than insured amount	9	
Claiming more than maximum amount payable	3	
Mailing container not presented to postal authorities in a timely manner	3	
Nonpayment for content of video tapes (programming or recording costs)	1	
No proof of reconstruction	3	
No proof of loss, Form 1000 incomplete	1	
Exterior container not presented, only damaged contents	1	
Delayed due to address change	1	
Insufficient address for addressee, no return address	1	
Article delivered to organization as addressed, no loss	1	
Successful delivery to military installation, no indemnity for loss	1	
Insured claim not filed within 1 year	1	
Claim has not been through the entire appeal process	1	
No indemnity for spoilage of perishable items	1	
Limitation of liability on currency sent through the mails	2	
Failure of customer to accept USPS ruling on COD payment method by addressee	2	
Nonmailable matter (alcoholic content)	1	
Claiming more than value of article and sales receipt	1	
No insurance purchased	3	
Non-receipt of item (complete loss)	12	
Loss of contents	11	
Late delivery/USPS failure	6	
Merchandise versus documents	5	
Disputed claim payment/no proof of insurance limit/value - Additional payment to cover actual costs	17	
Incorrect insurance fees	3	
Dispute over who is in possession of damaged article	1	
Dead bees	3	
<b>TOTALS</b>	<b>251</b>	
<b>CLAIMS CASES IN REVIEW</b>	<b>157</b>	

# DECLARATION

I, Michael K. Plunkett, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

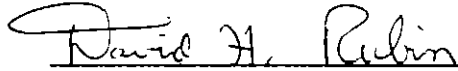


MICHAEL K. PLUNKETT

Dated: 10/9/97

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
David H. Rubin

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
October 9, 1997